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December 18, 2019

By ECF

Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Tomer Dafna, et al*, 19-cr-00408 (MKB)

Dear Judge Brodie:

This letter respectfully requests modification of Mr. Dafna's bail conditions for the balance of December for family and religious events.

First, he requests an extension of his curfew from 7:00 p.m. to 10:00 p.m. each night between December 20-30, 2019, because his twin teenage daughters are visiting from Israel during those dates, and he would like to spend time with them and the rest of his family outside of his home. This period coincides with the holiday of Chanukah when he and his family are invited to candle-lighting celebrations at friends' homes. These social/religious occasions begin at sunset and last into the evening. Pretrial Services and the government do not consent to extend Mr. Dafna's curfew beyond 7:00 p.m. for any of these nights.

Second, Mr. Dafna requests permission to travel with his family on December 24th to the American Dream Amusement Park in Rutherford New Jersey; and, on December 26th, to the Campgaw Ski Area in Mahwah, New Jersey. A snow date for both family outings would be December 29th. Pretrial Services and the government consent to this travel but only with a 7:00 p.m. curfew. Given the proximity of these locations to his home and traffic this time of year, a 7 p.m. curfew is not realistic. For these reasons, we respectfully request a curfew time of 10 p.m. for these nights as well.

Thank you for your consideration of this letter.

Respectfully yours,

  
Alan S. Futerfas

cc: Shannon Jones, Esq. (via ECF)